

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

United States Courts
Southern District of Texas
FILED

THE STATE OF TEXAS

1:25-MJ-144

February 13, 2025

COUNTY OF CAMERON

Nathan Ochsner, Clerk of Court

BEFORE ME, the undersigned authority, on this day personally appeared to be the person whose name is subscribed hereto, and being by me first duly sworn, upon oath deposes and says: "I am a HSI Special Agent stationed at Harlingen, Texas;

I investigated the case of the United States of America versus:

Leonardo BAEZ (DOB: [REDACTED] 969; Mexican Citizen, US Permanent Resident Card Holder) and
Nora Alicia AVILA GUEL (DOB: [REDACTED] 1978; Mexican Citizen, US Permanent Resident Card
Holder)

and from my investigation it appears that:

Roberto IBARRA OTERO (DOB: [REDACTED] 1972 Mexican Citizen) & Gerardo Emmanuel
SANCHEZ MARTINEZ (DOB: [REDACTED] 1984 Mexican Citizen)

citizen(s) and national(s) of Mexico, was(were) employed and harbored within the United States as specified in the complaint. The subject(s) is (are) a material witness in said cause and it may be impractical to secure their presence by subpoena and for that reason he (she)(they) should be held as material witness(es).

FURTHER AFFIANT SAYETH NOT.

Dillon Duke

Dillon Duke, Special Agent
HSI Special Agent

Submitted by reliable electronic means, sworn to and attested
telephonically per Fed. R. Cr.P.4.1, and probable cause found on:

14
13 th day of February, 2025.


Ignacio Torteya III
U.S. MAGISTRATE JUDGE